

# EXHIBIT A

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION

KASTURI HALDAR,

Plaintiff,

v.

UNIVERSITY OF NOTRE DAME DU LAC,  
SANTIAGO SCHNELL, AND CINDY  
PARSEGHIAN,

Defendants.

Case No. 3:24-cv-00836-  
CCB-SJF

**AFFIDAVIT OF** [REDACTED]

I, [REDACTED], do hereby depose and state as follows:

1. I am a Ph.D. candidate at the University of Notre Dame.
2. I worked in the Haldar Laboratory from 2021 until it closed in December 2024.
3. My research focuses on non-ketotic hyperglycinemia (NKH). Specifically, I conduct gene therapy experiments and study brain energy metabolism on mice that we have bred to have unique attributes related to NKH. In addition, I had a small project in Kabuki Syndrome that involves behavioral studies and molecular analyses in the Kabuki Syndrome mouse.
4. In November 2024 I talked to the [REDACTED] about what materials I predicted I would need to complete my Ph.D. research. In that conversation she told me she understood the department would need to be flexible because it was difficult to predict in advance everything I might need as my experiments progressed.
5. In December 2024, I met with [REDACTED], [REDACTED], the [REDACTED], [REDACTED], and the [REDACTED], [REDACTED]

[REDACTED] to discuss the mice I would need for my experiments. I told them I would need 300 mice from the NKH P colony by February in order to finish my experiments this spring and graduate in May 2025.

6. In December 2024, I also told [REDACTED] I might need NKH mice from the CH colony and that the budget should be flexible in case this need arose.
7. In my December conversations with [REDACTED] I was very focused on my NKH research and saving those colonies from euthanization. I did not discuss the Kabuki mice, in the F colony, with [REDACTED] in those December 2024 conversations. Notre Dame euthanized the entire F colony.
8. As I am now submitting my work for publication in journals, I realize it is possible journals will ask for more experiments on the F colony mice before they will publish my studies, reducing the chance of my studies being published because I cannot do additional experiments.
9. In January 2025 I met with [REDACTED] and told her again that I needed the 300 P colony mice. She told me that the mice were on track. She also told me that the vivarium would be providing me CH mice to test and genotype so that Notre Dame could eventually cryogenically preserve those mice. I did not understand from that meeting that the cryopreservation of the CH mice was imminent, or that any changes were being made to that colony.
10. At a meeting on or around February 26, 2025, with [REDACTED] [REDACTED], and [REDACTED], I told [REDACTED] and the vivarium staff that I would need 48 CH mice to complete my experiments. In that meeting they disclosed to me that they had allowed the colony to dwindle to just

two breeding pairs, both of which are already past the optimal breeding age. Because the CH mice have such severe mutations, they are extremely delicate and do not breed well, giving them a much shorter breeding window than other mice we work with.

11. In the February 26 meeting [REDACTED] said that Notre Dame would consider whether to breed these mice and provide me the mice I need for my experiments. I have not heard back from her as to whether Notre Dame will or will not provide the mice.
12. If I do not receive the CH mice I need, my experiments on those mice will be incomplete. There will be a hole in my research that will make it difficult for me to publish my results in a prestigious journal, a step that is important for me to be a competitive applicant for post-doctoral fellowships and for future positions.
13. To date, I have received only 24 of the 300 mice from the P colony that I need to conduct my experiments.
14. Because I do not have the mice I need for my experiments, I cannot complete my experiments in time to write my dissertation and graduate in May.
15. If I miss the May graduation date the next date I can be awarded my Ph.D. is in August.

Signed under the pains and penalties of perjury this 17 day of March 2025.

[REDACTED]